



## MOSER LAW FIRM, P.C.

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February 13, 2018

Hon. A. Kathleen Tomlinson, USMJ  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Castillo v. Perfume Worldwide*, 17-cv-2972 (JS)(AKT)

Dear Judge Tomlinson:

I represent the Plaintiffs in the above referenced matter. On December 11, 2018 the Court ordered the parties to serve Interrogatories and Requests for Production of Documents no later than December 22, 2017, and to respond no later than Tuesday, January 30, 2018. The Court further directed the parties to address any deficiencies in the responses to first written discovery requests by tomorrow, February 14, 2018.

Plaintiffs' Interrogatories and Document Requests were served on December 22, 2018. On Thursday, February 1, 2018 I reached out to the Defendants as I had not yet received the responses. Defendants responded that they were trying to furnish the responses by Monday, February 5, 2018. On Saturday February 10, 2018 I received from Defendants an excel spreadsheet and a word document, a copy of which is annexed hereto, with an indication that responses in would be furnished this week. I attempted to reach Defendants' counsel by telephone this afternoon and left a message for him to return my call.

The Defendants have not yet furnished responses or objections to Plaintiffs' Interrogatories and Requests for Production of Documents. I therefore move for an order compelling the Defendants to respond *without objection* to Plaintiffs' first written discovery requests on or before February 16, 2018. I also request that the date to confer about the adequacy of the responses be extended to February 23, 2018, and that the deadline to file a motion with regard to the discovery responses be extended to March 8, 2018.

Respectfully submitted,



Steven John Moser

1. Attached in First Sheet of the File
2. Attached in the second Sheet of the file
3. Thomas Kannathara. Book keeper. He would take the export from the machines described in Point # 5 and report them to ADP.
4. ADP has been the company using this the entire requested period  
Finger Tec Model :TA200plus

Serial no:

- 1)3205318
- 2)3213609
- 3)3213608
- 4)3213610
- 5)3205032
- 6) 3205031

5. ADP
6. Not applicable
7. We are not sure what this means.
8. All of this is stored in an excel database. An export of this has been provided.
9. Piyush Golia and Prabha Golia are the Principals, with 60% and 40% respective ownership percentages.
10. None, except for the ones identified in Section 10.
11. None, except for the ones identified in Section 10.
12. Pavittar Singh – Warehouse Manager.
13. None.
14. Thomas Kannathara only.
15. Piyush Golia and Thomas Kannathara.
16. Piyush Golia and Thomas Kannathara.
17. Blank.
18. We use ADP, who secures these.